

1 DAVID L. ANDERSON (CABN 149604)
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 MICHAEL A. RODRIGUEZ (NYBN 4938262)
Assistant United States Attorney

5 450 Golden Gate Avenue, Box 36055
6 San Francisco, California 94102-3495
7 Telephone: (415) 436-7146
8 FAX: (415) 436-7234
michael.rodriguez@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 UNITED STATES OF AMERICA,)	No. CR 18-0430 RS
14)	
15 Plaintiff,)	
16 v.)	STIPULATION AND ORDER SETTING
17 SAMUEL TAYLOR DERENCE,)	HEARING DATE AND EXCLUDING TIME
18 Defendant.)	FROM THE SPEEDY TRIAL ACT
)	CALCULATION
)	
)	
)	

19
20 Defendant Samuel Taylor Derence, represented by his attorney, Gabriela Bischof, and the
21 Government, represented by Michael A. Rodriguez, appeared before the Court on April 23, 2019 for a
22 status hearing. The Court set a further status hearing for May 21, 2019 at 2:30 p.m. Counsel for
23 defendant represented that additional time was needed for attorney preparation and has requested that
24 time be excluded under the Speedy Trial Act between April 23, 2019 and May 21, 2019. The
25 Government did not object to the request to exclude time.

26 Therefore, the parties agree, and the Court finds and holds, as follows:

- 27 1. This matter is set before this Court for a status hearing on May 21, 2019 at 2:30 p.m.
28 2. The time between April 23, 2019 and May 21, 2019 is excluded under the Speedy Trial

1 Act. Failure to grant the requested continuance would deny defense counsel the reasonable time
2 necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C.
3 § 3161(h)(7)(B)(iv). The ends of justice served by granting the requested continuance outweigh the best
4 interests of the public and the defendant in a speedy trial and in the prompt disposition of criminal cases.
5 *See id.* § 3161(h)(7)(A).

6
7 Dated: April 24, 2019

/s/ Gabriela Bischof
GABRIELA BISCHOF
Assistant Federal Public Defender
Counsel for Samuel Taylor Derence

8
9
10 Dated: April 24, 2019

/s/ Michael A. Rodriguez
MICHAEL A. RODRIGUEZ
Assistant United States Attorney

11
12
13 IT IS SO ORDERED.

14 Dated: April 29, 2019


RICHARD SEEBORG
United States District Judge